

Joseph P.Zemen
Tanco Clark Maritime L.L.C.
P.O.Box 565
Hammond, IN 46325

Re: Registered Construction and Operation Status,
019-12590-00104

Dear Joseph P.Zemen:

The application from Tanco Clark Maritime L.L.C., received on August 11, 2000, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.1, it has been determined that the following Asphalt Storage Facility, to be located at Clark Maritime Center, Jeffersonville, IN 47130, is classified as registered:

- (a) One (1) asphalt storage tank, identified as TANK #101, with a maximum storage of 420,000 gallons and maximum throughput of 1,263,368 gallons per year, and exhausting to atmosphere.
- (b) One (1) asphalt storage tank, identified as TANK #102, with a maximum storage of 1,260,000 gallons and maximum throughput of 3,790,107 gallons per year, and exhausting to atmosphere.
- (c) Two (2) asphalt storage tanks, identified as TANK #103 and TANK #104, each with a maximum storage of 4,620,000 gallons and maximum throughput of 13,897,059.8 gallons per year, and exhausting to atmosphere.
- (d) One (1) boiler, identified as Boiler, with a maximum capacity of 8.5 million BTU per hour, and exhausting to stack #3.
- (e) Two (2) thermal fluid heaters, identified as #1 and #2, with maximum capacity of 8 and 14 million BTU per hour, and exhausting to stacks #1 and #2 respectively.

The following conditions shall be applicable:

1. This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb. According to this rule:

The owner or operator of each storage vessel subject to this subpart, shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.
2. Pursuant to 326 IAC 5-1-2 (2) (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
 - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
3. Pursuant to 326 IAC 2-6 (Emission Reporting), the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).
4. Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating), the particulate emissions from indirect heating facilities shall be limited to 0.45 pounds of particulate matter per million BTU heat input as determined by the following equation:

$$P_t = \frac{1.09}{Q^{0.26}}$$

Where: P_t = Pounds of particulate matter emitted per million Btu (lb/mmBtu) input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

This registration is the first air approval issued to this source. The source may operate according to 326 IAC 2-5.1.

An authorized individual shall provide an annual notice to the Office of Air Management that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.1-2(f)(3). The annual notice shall be submitted to:

**Compliance Data Section
Office of Air Management
100 North Senate Avenue
P.O. Box 6015
Indianapolis, IN 46206-6015**

no later than March 1 of each year, with the annual notice being submitted in the format attached.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Management

GS

cc: File - Clark County
Clark County Health Department
Air Compliance - Joe Foyst
Permit Tracking - Janet Mobley
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Registration Annual Notification

This form should be used to comply with the notification requirements under 326 IAC 2-5.1-2(f)(3)

Company Name:	Tanco Clark Maritime L.L.C
Address:	Clark Maritime Center
City:	Jeffersonville, IN 47130
Authorized individual:	Joseph P.Zemen
Phone #:	(219)-937-4460
Registration #:	019-12590-00104

I hereby certify that Tanco Clark Maritime L.L.C is still in operation and is in compliance with the requirements of Registration 019-12590-00104.

Name (typed):
Title:
Signature:
Date:

Indiana Department of Environmental Management Office of Air Management

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Tanco Clark Maritime L.L.C.
Source Location: Clark Maritime Center, Jeffersonville, Indiana 47130
County: Clark
SIC Code: 4226
Operation Permit No.: 019-12590-00104
Permit Reviewer: Gurinder Saini

The Office of Air Management (OAM) has reviewed an application from Tanco Clark Maritime L.L.C. relating to the construction and operation of an Asphalt Storage Facility.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) asphalt storage tank, identified as TANK #101, with a maximum storage of 420,000 gallons and maximum throughput of 1,263,368 gallons per year, and exhausting to atmosphere.
- (b) One (1) asphalt storage tank, identified as TANK #102, with a maximum storage of 1,260,000 gallons and maximum throughput of 3,790,107 gallons per year, and exhausting to atmosphere.
- (c) Two (2) asphalt storage tanks, identified as TANK #103 and TANK #104, each with a maximum storage of 4,620,000 gallons and maximum throughput of 13,897,059.8 gallons per year, and exhausting to atmosphere.
- (d) One (1) boiler, identified as Boiler, with a maximum capacity of 8.5 million BTU per hour, and exhausting to stack #3.
- (e) Two (2) thermal fluid heaters, identified as #1 and #2, with maximum capacity of 8 and 14 million BTU per hour, and exhausting to stacks #1 and #2 respectively.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

Existing Approvals

This is the first air approval for this applicant.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
Stack #1	Thermal Fluid Heater	30	2	1400	550
Stack #2	Thermal Fluid Heater	30	2	1400	550
Stack #3	Boiler	TBD*	TBD*	TBD*	TBD*

* to be determined

Recommendation

The staff recommends to the Commissioner that the **construction and operation** be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on August 11, 2000.

Emission Calculations

See Appendix A page 1 through 4 of this document for detailed emissions calculations.

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential To Emit (tons/year)
PM	0.3
PM-10	1
SO ₂	0.1
VOC	0.7
CO	11.2
NO _x	13.3

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of NO_x and CO is greater than 10 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-5.1.
- (b) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Clark County.

Pollutant	Status (attainment, maintenance attainment, or unclassifiable; severe, moderate, or marginal nonattainment)
PM-10	Attainment
SO ₂	Attainment
NO ₂	Attainment
Ozone	Moderate
CO	Attainment
Lead	Attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen are precursors for the formation of ozone. Therefore, VOC and NO_x emissions are considered when evaluating the rule applicability relating to the ozone standards. Clark County has been designated as nonattainment for ozone. Therefore, VOC and NO_x emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.
- (b) Clark County has been classified as nonattainment for Ozone. Therefore, these emissions were reviewed pursuant to the requirements for Emission Offset, 326 IAC 2-3.

Source Status

New Source PSD Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	0.3
PM10	1
SO ₂	0.1
VOC	0.7
CO	11.2
NO _x	13.3
Single HAP	-
Combination HAPs	-

- (a) This new source is **not** a major stationary source because no attainment pollutant is emitted at a rate of 250 tons per year or greater and it is not in one of the 28 listed source categories. Therefore, pursuant to 326 IAC 2-2, and 40 CFR 52.21, the PSD requirements do not apply.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This new source is not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
 (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
 (c) any combination of HAPs is less than 25 tons/year.

This is the first air approval issued to this source.

Federal Rule Applicability

- (a) This source is subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart Kb. According to this rule:

The owner or operator of each storage vessel subject to this subpart, shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel.

- (b) This source is not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.470, Subpart UU, because the asphalt storage tanks are not located at asphalt roofing plants, petroleum refineries and asphalt processing plants
- (c) There are no other New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of Oxides of Nitrogen and the source is located in Clark County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

The plant is located in the Jeffersonville Township. Therefore, pursuant to 326 IAC 5-1-2 (2) (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of thirty percent (30%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of asphalt storage will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating)

Pursuant to 326 IAC 6-2-4 (Particulate emission limitations for sources of indirect heating), the particulate emissions from indirect heating facilities shall be limited to 0.45 pounds of particulate matter per million BTU heat input as determined by the following equation:

$$Pt = \frac{1.09}{Q^{0.26}}$$

Where: Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) input.
Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Conclusion

The construction and operation of this Asphalt Storage Facility shall be subject to the conditions of the attached proposed Registration 019-12590-00104.

Appendix A: Emission Calculations
Summary of PTE

Page 1 of 4 TSD App A

Company Name: Tanco Clark Maritime L.L.C.
Address City IN Zip: Clark Maritime Jeffersonville, IN 47130
CP#: 019-12590
Plt ID: 019-00104
Reviewer: Gurinder Saini
Date: August 21, 2000

Potential to Emit (Tons/Year)								
Activity Type	PM	PM-10	SO2	VOC	CO	NOx	HAP	HAPS
Boiler	0.1	0.3	0	0.2	3.1	3.7	-	-
Heaters	0.2	0.7	0.1	0.5	8.1	9.6	-	-
Tanks	-	-	-	-	-	-	-	-
Total	0.3	1	0.1	0.7	11.2	13.3		

From page 2, 3 and 4 of the Appendix A

Appendix A: Emissions Calculations**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****Company Name: Tanco Clark Maritime L.L.C.****Address City IN Zip: Clark Maritime, Jeffersonville, IN 47130****CP: 019-12590****Plt ID: 019-00104****Reviewer: Gurinder Saini****Date: August 21, 2000**Heat Input Capacity
MMBtu/hrPotential Throughput
MMCF/yr

8.5

74.5

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.1	0.3	0.0	3.7	0.2	3.1

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Small Industrial Boiler
HAPs Emissions

Page 2 of ? TSD App A

Company Name:
Address City IN Zip:
CP:
Plt ID:
Reviewer:
Date:

HAPs - Organics

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	7.818E-05	4.468E-05	2.792E-03	6.701E-02	1.266E-04

HAPs - Metals

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	1.862E-05	4.095E-05	5.212E-05	1.415E-05	7.818E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
 Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations

Page 4 of 4 TSD App A

Natural Gas Combustion Only**MM BTU/HR <100****Thermal Fluid Heater****Company Name: Tanco Clark Maritime L.L.C.****Address City IN Zip: Clark Maritime Jeffersonville, IN 47130****CP: 019-12590****Plt ID: 019-00104****Reviewer: Gurinder Saini****Date: August 21, 2000**

Tank Number	Product Stored	Annual Throughput (kgal/year)	Capacity (gallons)	Losses (Tons per Year)			Total
				Working	Breathing	Withdraw	Tons/yr
Tank # 101	Asphalt	1,263	420,000	negligible	negligible	negligible	negligible
Tank # 102	Asphalt	3,790	1,260,000	negligible	negligible	negligible	negligible
Tank # 103	Asphalt	13,897	4,620,000	negligible	negligible	negligible	negligible
Tank # 104	Asphalt	13,897	4,620,000	negligible	negligible	negligible	negligible

Note: All storage tank emissions estimated using EPA's TANKS 4.0 software program.